

FY21 Modern Slavery Statement

For Financial Year ending 31 March 2021

Reporting Entity

This statement is submitted under section 13 of the *Modern Slavery Act 2018* (Cth) for the Shimano Office Trust ABN 33 592 354 043. This Statement has been prepared by the Trustee Perpetual Corporate Trust Limited ACN 000 341 533 and approved by the board of directors of the Trustee on 24th November 2021.



Richard McCarthy

Director

Perpetual Corporate Trust Limited

Consultation

There are no subsidiaries or entities owned or controlled by Shimano Office Trust which the Trustee is required to consult with to prepare this Statement. This statement was developed in consultation with the investment manager.

Structure, Operations and Supply Chain

Structure

Shimano Office Trust is domiciled in Australia and has been in operational since 2012. Shimano Office Trust invests in the Charter Hall Office Trust. The Trust owns no real property and has no employees. The trust does not directly hold property but rather holds units in the Charter Hall Office Trust.

Operations

The primary operation of Shimano Office Trust is the investment in Charter Hall Office Trust which is a property fund with a portfolio of high-quality commercial office properties in Australian capital cities. Shimano Office Trust is managed by the trustee Perpetual Limited's division Perpetual Corporate Trust.

Perpetual Corporate Trust (PCT)

Provides a broad range of fiduciary and agency products to the debt capital markets and managed funds industries in Australia and Singapore. Perpetual Digital, PCT's innovation company, encompasses data services, industry roundtables and our Perpetual Intelligence digital platform, which supports the banking and financial services industry. In providing these services, Perpetual Corporate Trust utilises a number of entities in the Perpetual Group, including PTCO, Perpetual Corporate Trust Limited, Perpetual Trust Services Limited, The Trust Company (RE Services) Limited, The Trust Company Limited, The Trust Company (Australia) Limited and Perpetual (Asia) Limited. In addition, the data and analytics services within Perpetual Digital are provided by a

few entities in the Perpetual Group including Perpetual Nominees Limited, Perpetual Digital Pty Limited Perpetual Roundtables Pty Limited and Laminar Capital.

Investments

The Trusts major asset classes were property. The account domicile was concentrated in Australia.

Supply chain

The Trust's supply chain consists of three direct service providers. These service providers are all located in Australia.

Procurement categories for service providers include:

- Investment management services
- Professional services, including an accountant and tax agent

Modern Slavery Risks

The Trustee understands that modern slavery risk can occur in operations and supply chains. The Trustee considers risk assessment a critical process to identifying the inherent risk of modern slavery across Shimano Office Trust.

Defining modern slavery risks

Modern Slavery is an umbrella term. Essentially, it refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, abuse of power, or deception. It is largely invisible, in part because it disproportionately affects the most marginalised¹ The Trustee recognises that COVID-19 has exacerbated modern slavery risks for people in vulnerable situations².

Modern slavery includes human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour³. When thinking about the risk of modern slavery practices, this means the potential for the Trust to cause, contribute to, or be directly linked to modern slavery through the Trust's operations or supply chain.

Risk assessment methodology

In FY21, the Trustee collected information on Shimano Office Trust supply chain and operations to include in a modern slavery risk assessment. Specifically, the Trustee investigated the investment trust and service providers that the Trust has a direct relationship with. The investment trust and service providers were then assessed for inherent modern slavery risks and an inherent risk profile was determined for each entity. Inherent risk is the level of risk before any actions are taken to manage the risk's impact or likelihood. The FY21 risk assessment has been conducted and compiled by Perpetual Limited's Sustainability and Modern Slavery Manager.

Risk Assessment Results

Investments

The FY21 risk assessment conducted by the Trustee revealed that this investment sector is considered to have higher inherent risk, as it is a part of the property and construction industries. The below information summarises the risks in these industries. The approach to due diligence and assessment is informed by this risk profile.

¹ The Minderoo Foundation, 2018. [The Global Slavery Index 2018](#), 7,2.

² Obokata, Tomoya, United Nations, 2020. [Impact of the coronavirus disease pandemic on contemporary forms of slavery and slavery-like practices](#)

³ As defined in the Australian Modern Slavery Act 2018 (Cth)

Investment Sector

Office Buildings

Inherent Risk Profile

The property and construction industries have a higher risk of modern slavery due to the high demand for low-skilled labour, limited visibility of long and complex supply chains, sub-contracting and low-tier suppliers that operate in high-risk geographies⁴.

Supply Chain

The Trustee's FY21 risk assessment did not identify any high-risk service providers for the Trust. This is because, all service providers are asset management and professional service providers who operate in Australia.

Actions to Address Modern Slavery Risks

Due Diligence

Risk assessment

The Trustee's annual risk assessment was conducted to assess Shimano Office Trust inherent modern slavery risks. In FY21 the Trustee has improved disclosure by providing inherent risk profiles of the investment holdings.

Investments

The Trustee of Charter Hall Office Trust is Charter Hall Wholesale Management Limited. Charter Hall Wholesale Management Limited is a subsidiary of Charter Hall Limited⁵. Charter Hall Limited is required to report under the Modern Slavery Act 2018 (Cth). Their statement is prepared and issued by [Charter Hall Limited](#) (ABN 57 113 531 130) and Charter Hall Funds Management Limited (ABN 31 082 991 786 AFSL 262861) (CHFML) as Responsible Entity of the Charter Hall Property Trust (together, the Charter Hall Group).

Charter Hall's due diligence includes risk assessment and supplier onboarding, human rights and modern slavery framework and working group, grievance mechanism, industry engagement and training. When engaging with the property and construction sector, the Charter Hall Group screens for modern slavery with general contractors. The Charter Hall Group predominately manages real estate assets in operations – they screen their property and operations management services for modern slavery. The Trustee has reviewed Charter Hall's modern slavery due diligence and is confident that they are addressing their modern slavery risks sufficiently.

Supply Chain

Although the FY21 risk assessment conducted by the Trustee did not identify any high-risk service providers, all service providers of the Trust are required to report under the *Modern Slavery Act 2018* (Cth). Therefore, they are obligated to identify and address modern slavery risks in their operations and supply chains. As a result, they have modern slavery due diligence processes in place.

An analysis of actions to address modern slavery has revealed that all suppliers have grievance mechanisms in place. Grievance mechanisms are key to reporting incidents of modern slavery.

⁴ KPMG and Australian Human Rights Commission, 2020. [Property, Construction & Modern Slavery: Practical responses for managing risk to people](#), 9.

⁵ Whilst the Trust has an indirect exposure to the commercial services and supplies industry via its investment in the Charter Hall Office Trust; as a passive investor in that Trust, the Trustee has no contractual right to investigate or effect action.

Measuring the Effectiveness of Actions

Outlined below is the key progress made by the Trustee on behalf of Shimano Office Trust in FY21 and the actions for FY22.

FY21 progress:

- Mapped Shimano Office Trust's supply chain to identify the different sectors our service providers are from.
- Conducted annual risk assessment to determine inherent modern slavery risks.
- Conducted desktop research on investment trust and service providers, to understand their approaches to identifying and addressing modern slavery risks.

Actions for FY22

- Monitor emerging global trends in modern slavery and included anything relevant in the FY22 risk assessment.

Appendix

Appendix 1: Australian Modern Slavery Act – Mandatory Reporting Criteria

The following table describes the location of each mandatory reporting criteria within the FY21 modern slavery statement.

Mandatory Reporting Criteria	Location in Statement
Identify the reporting entity	Reporting Entity, Page 1
Describe the reporting entity's structure, operations, and supply chains	Structure, Operations and Supply Chain, Page 1, 2
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Modern Slavery Risks, Page 2, 3
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	Actions to Address Modern Slavery Risks, Page 3
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Measuring the Effectiveness of Actions, Page 4
Describe the process of consultation and any entities the reporting entity owns or controls	Consultation, Page 1